



March 1, 2010
Via ECFS

Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36
Annual 64.2009(e) CPNI Certification for 2009

IP5280 Communications, LLC

Filer ID: 827447

Dear Ms. Dortch:

Enclosed for filing is the 2009 CPNI Compliance Certification submitted on behalf of IP5280 Communications, LLC. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 10-91 issued January 15, 2010.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes
Consultant to IP5280 Communications, LLC

Attachments

cc: Best Copy and Printing (via email to FCC@BCPIWEB.COM)
J. King, IP5280
file: IP5280- CPNI
tms: FCCx2010-1

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for:	Calendar Year 2009
Date Filed:	March 1, 2010
Name of Companies covered by this certification:	IP5280 Communications, LLC
Form 499 Filer ID:	827447
Name of Signatory:	John Scarborough
Title of Signatory:	Managing Partner

I, John Scarborough, certify and state that:

1. I am the Managing Partner of IP5280 Communications, LLC ("IP5280") and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.


John Scarborough, Managing Partner
IP5280 Communications, LLC

3-1-10
Date

Attachments: Attachments: Exhibit A - Statement of CPNI Procedures and Compliance
Explanation of actions taken against data brokers – not applicable
Summary of customer complaints – not applicable

Attachment A
Statement of CPNI Procedures and Compliance

IP5280 Communications, LLC

Calendar Year 2009

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

IP5280 Communications, LLC

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (2009)

IP5280 Communications, LLC ("IP5280" or "Company") is a retail provider of interconnected VOIP services. Although the Company does have CPNI and call detail records, such information is not used for marketing purposes. Furthermore, the Company does not provide CPNI to third parties and does not sell CPNI. IP5280 is committed to protecting the confidentiality of all customer information, including CPNI and call detail records.

Company employees are trained in the proper use and protection of CPNI, and are prohibited from disclosing such information. The Company provides for disciplinary action for such violations, up to and including termination of employment.

IP5280 bills customers directly and has taken steps to secure CPNI and manage its release in accordance with FCC rules. Customer account information can only be accessed by authorized representatives of IP5280. Such authorized representatives have access to customer records management systems only via an established password protected account set up in their name by a system administrator. When IP5280 employees access customer information, of any type, an electronic audit log is created on the account that indicates the company agent that accessed the records.

All employees with access to billing and provisioning systems containing CPNI, have unique user names and passwords whose activity can be tracked based on timestamps of when systems are accessed. In addition, the only employees allowed to receive a user name and password have a signed Confidentiality Agreement in their employee file. All customer records are maintained on password protected servers, and any activity can be tracked by unique user names and passwords assigned to authorized personnel.

The Company does not disclose call record information over the telephone. If a customer requests call records, the records are emailed to a confirmed authorized user for that particular company.

The Company does not provide web portals for end-user customers to view call detail and configuration details of their purchased VOIP services.

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (2009)
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The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2009.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.